

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Latif Conway

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

TransFix inc.

See Complaint

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

2:23-cv-1389-DCN-MHC

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☒ No
(check one)

RECEIVED USDC
CLERK, CHARLESTON, SC
2023 APR -6 PM 2:43

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Latif Conway</u>
Street Address	<u>PO Box 14242</u>
City and County	<u>Cincinnati OH Hamilton</u>
State and Zip Code	<u>OHIO 45255 45250</u>
Telephone Number	<u>513 427 2211 Free Truck</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>See Attachment</u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>

Defendant No. 2

Name	<u></u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>

Defendant No. 3

Name	<u></u>
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Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____

Defendant No. 4

Name _____
 Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____. Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$ 270,300.00

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attachment

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See Attachment

UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

TENTATIVE AMOUNT \$270300

DATE: 04/06/2023

Case no: _____

Pursuant to 18 U.S. Code § 1964(c)

Plaintiff

LATIF CONWAY

P.O. BOX 14242

CINCINNATI, OH 45250

Pro se

DEFENDANT

LILY SHEN CEO

Transflix Inc.

11 Park Place, Fl 19

New York, NY 10007-2804

Defendant

Transflix Inc. 11 Park Place, Fl 19

New York, NY 10007-2804

Defendant

Broker II Phillip Dennis

Transflx Inc. 11 Park Place, Fl 19
New York, NY 10007-2804

Defendant

Ed Byrd FOUNDER & PRESIDENT

Kontane Logistics

830 DROP OFF DR

SUMMERVILLE, SC 29483.

Defendant

Jason Ball DIRECTOR OF LOGISTICS

Kontane Logistics

830 DROP OFF DR

SUMMERVILLE, SC 29483.

1. NOW COMES the Plaintiff, herein, complaining of the Defendant(s) who would respectfully allege, state, and show unto this Court
2. as follows: As a private right of action for plaintiff who has and continues to suffer a compensable injury from the defendants,
3. Herein below brings about the racketeering acts of the defendant(s), which also affect interstate commerce.

4. STATEMENT OF SUBJECT MATTER: JURISDICTION.

5. This Court has subject matter jurisdiction over this action pursuant to 18 U.S.C. § 1964
6. This Court has personal jurisdiction over the defendants as these defendants are citizen(s)/residents of Dorchester County, SC.
7. and or these defendants routinely and regularly conduct business and their employed/public duties are in Dorchester County, SC.
8. Venue is proper in Dorchester County, SC in that the claims arise from actions committed in Dorchester County, SC.

9. **Background**

10. **The Defendant:** Transflix Inc. 11 Park Place, Fl 19 New York, NY 10007-2804

11. **Broker:** Defined at 49 U.S.C. §13102(2):

12. **The Defendant** LILY SHEN 11 Park Place, Fl 19 New York, NY 10007-2804

13. **CEO**

14. **The Defendant:** Phillip Dennis , 11 Park Place, Fl 19 New York, NY 10007-2804

15. **Broker:** Defined at 49 U.S.C. §13102(2): (Acting Broker II for Transflix Inc).

16. **The Defendant;** Ed Byrd FOUNDER & PRESIDENT "Kontane Logistics" VNDR 824725 4894 OFFSITE)[sic]", 830 DROP OFF DR

17. SUMMERVILLE, SC 29483.

18. **Business description:** Kontane Solutions integrates all of our services – value-added warehousing, custom crating and

19. packaging, order fulfillment and sub-assembly – to build logical, customer-focused logistics platforms.

20. **The Defendant;** Jason Ball DIRECTOR OF LOGISTICS "Kontane Logistics" VNDR 824725 4894 OFFSITE)[sic]", 830 DROP OFF

21. DR SUMMERVILLE, SC 29483. **Business description:** Kontane Solutions integrates all of our services – value-added

22. warehousing, custom crating and packaging, order fulfillment and sub-assembly – to build logical, customer-focused logistics

23. platforms.

24. **The Defendant;** Consignee: Receiving Clerk John Doe 1[sic], "Kontane Logistics" VNDR 824725 4894 OFFSITE)[sic]", 830 DROP

25. OFF DR SUMMERVILLE, SC 29483. **Business description:** Kontane Solutions integrates all of our services – value-added

26. warehousing, custom crating and packaging, order fulfillment and sub-assembly – to build logical, customer-focused logistics

27. platforms.

28. STATEMENT OF PARTIES

29. The Plaintiff rendered transportation services for defendant(s). The load was picked up in Fremont, OH and delivered to

30. Summerville, SC. A service failure occurred in Summerville, SC. Refused product was placed back on the trailer.

31. **Attention to the court.** It seems there's multiple businesses that don't have distinctive addresses. "Kontane Logistics" "VNDR

32. 824725 4894 OFFSITE"[sic]. Through discovery will shed more light. After fact checking further. The State Secretary's website

33. shows Kontane Logistics business has been dissolved in Summerville, South Carolina. Kontane Logistics website has

34. no-disclosure of Summerville, SC location. Google search disclosed a "Kontane Logistics" at the current address of 830 DROP

35. OFF DR SUMMERVILLE, SC 29483. Absent the title "VNDR 824725 4894 OFFSITE"[sic]. I'm not going any further in this area. This

36. Instance needs not to be litigated in a civil court forum. Unless further proceedings are needed of the judge's request.

37. NoneTheLess, all respective parties that render service(s) thereof are the relevant parties herein.

38. COMPLAINT

39. On or about 03/27/2023 the defendant(s) conduct is misleading, deceptive, fraudulent and by the way of force. Whereas, the

40. defendant(s) criminal conduct creates a conduit for Plaintiff to absorb expense at my own peril. And while incurring mounting

41. expenses at the plaintiff's expense. Create so much anxiety dealing with coercion/extortion, restrictive movement, how debt needs

42. to be serviced, vehicle maintenance to be performed, home expenditures, and recreational time. Such conduct perpetuates a

43. pattern of racketeering via a breach of contract, breach of public trust as in public utility, fraud, incurred debt, coercion/extortion,

44. and kidnapping. And that defendant(s) used interstate wire and or commerce to further the scheme on the behalf of the enterprise.

45. Complaint 1

46. **Complaint:** John Doe 2[sic] a forklift driver whom Plaintiff approached outside about a pallet,

47. Plaintiff asked John Doe 2[sic] there's a pallet on trailer that's not on manifest. It's not mine, it needs to be

48. removed(paraphrasing). John Doe 2[sic] stated he didn't know. Go to the receiving clerk(paraphrasing).

49. Count 1

50. On or about 03/27/2023 John Doe 2[sic] conduct is *neglect*. John Doe 2[sic] a forklift driver. Manager(s)* trained or

51. job experience taught John Doe 2[sic] how to deal with the above styled, Complaint 1. Thereso, John Doe 2[sic] negligence

52. perpetuates fraud, indebtedness, anxiety, and or loss of income. Defendant's conduct actually, potentially, obstructs, delays, and
53. affects interstate commerce. Such negligence causes indebtedness, how to service debt, vehicle maintenance, home expenditure
54. leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that defendant conduct furthers the
55. scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the behalf of the enterprise. Pursuant
56. to 18 U.S.C. § 1962(c).

Complaint 2

57. **Complaint:** Thereafter, plaintiff went back into the receiving door for assistants.
58. **Plaintiff:** Stated to **Defendant John Doe 1[sic]**: There's a pallet left on the trailer. It's not mine. Please remove it.
59. **Defendant John Doe 1[sic]**: It's not ours.

60. Count 2

61. **Defendant John Doe 1[sic]**: Failed due diligence, a duty to perform where pallet comes from. Defendant's conduct actually,
62. potentially, obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness, how to service debt, vehicle
63. maintenance, home expenditure, leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that
64. defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the
65. behalf of the enterprise. Pursuant to 18 U.S.C. § 1962(c).

66. Count 3

67. **Defendant John Doe 1[sic]**: Negligence perpetuates *extortion* to incur debt of dealing with refuse products. Defendant's conduct
68. actually, potentially, obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness, how to service debt,
69. vehicle maintenance, home expenditure, leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And
70. that defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the
71. behalf of the enterprise. Pursuant to 18 U.S.C. § 1962(c).

72. Count 4

73. **Defendant John Doe 1[sic]**: Negligence perpetuates *kidnapping*(restrictive movement) of plaintiff dealing with refuse products.
74. Defendant's conduct actually, potentially, obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness,
75. how to service debt, vehicle maintenance, home expenditure,

76. leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that defendant conduct furthers the
77. scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the behalf of the enterprise. Pursuant
78. to 18 U.S.C. § 1962(c).

79. Complaint 2

80. **Complaint:**

81. **Plaintiff:** That pallet is not on the manifest. It needs to be removed from the trailer.

82. **John Doe 1:** It came off trailer. We put it back on the trailer.

83. **Plaintiff:** It's not on the manifest. Removed from the trailer. Please!

84. Another party interjected. Outburst of an obscenity. Nothing the plaintiff will take as derogatory. I view such utterance in the context
85. of joking.

86. Count 5

87. As the degree of tort moves up. **Defendant John Doe 1[sic]** willfully failed to fact check where the pallet comes from. Defendant's
88. conduct actually, potentially, obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness, how to
89. service debt, vehicle maintenance, home expenditure, leisure time at home, and anxiety. Which causes me to suffer a
90. compensable injury. And that defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail,
91. and or commerce. On the behalf of the enterprise. Pursuant to 18 U.S.C. § 1962(c).

92. Count 6

93. **Defendant John Doe 1[sic]** wilfully perpetuates *extortion* to incur debt of dealing with refuse products. Defendant's conduct
94. actually, potentially, obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness, how to service debt,
95. vehicle maintenance, home expenditure, leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And
96. that defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the
97. behalf of the enterprise. Pursuant to 18 U.S.C. § 1962(c).

98. Count 7

99. **Defendant John Doe 1[sic]** wilfully perpetuates *kidnapping*(restrictive movement) of dealing with refuse products I'm forced to
100. take that's not on manifest. Defendant's conduct actually, potentially, obstructs, delays, and affects interstate commerce. Such

101. extortion causes indebtedness, how to service debt, vehicle maintenance, home expenditure
 102. leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that defendant conduct furthers the
 103. scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the behalf of the enterprise. Pursuant
 104. to 18 U.S.C. § 1962(c).

105. **Complaint 3**

106. Dealing with **Defendant Broker II Phillip Dennis**. We'll have to start at a higher tort degree. Defendants have been told on several
 107. occasions. Before Then, and, thereafter, dealing with current and other matters that not entailed herein. Therefore, starting at wilful
 108. malice is appropriate.

109.

Complaint: Emails were sent 448p.m. est pm to **Defendant Broker II Phillip Dennis**. For disposition of refused products.

Defendant Broker II Phillip Dennis did not reply. Third person replied. 501 p.m est. With a generic reply. Whereas, such requested
 info was already sent. However, **Defendant Broker II Phillip Dennis** was not there to service the load.

110. **Count 8**

111. **Defendant Broker II Phillip Dennis** conduct perpetuates *kidnapping*(restrictive movement) until he comes back to work.
 112. Defendant's conduct actually or potentially and or obstruct, and or delay, and or affect interstate commerce. Such restrictive
 113. movement, causes indebtedness, how to service debt, vehicle maintenance, home expenditure,
 114. leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that defendant conduct furthers the
 115. scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the behalf of the enterprise. Pursuant
 116. to 18 U.S.C. § 1962(c).

117. **Count 9**

118. **Defendant Broker II Phillip Dennis**. *Wilful malice* perpetuates *kidnapping*(restrictive movement) dealing with refuse products.
 119. Defendant's conduct actually or potentially and or obstruct, and or delay, and or affect interstate commerce. Plaintiff was forced to
 120. wait until **Defendant Broker II Phillip Dennis** was available. 15 hrs later* A reply came for a disposition of refused
 121. product. Defendant's conduct actually or potentially and or obstruct, and or delay, and or affect interstate commerce. Such restrictive
 122. movement, causes indebtedness, how to service debt, vehicle maintenance, home expenditure

123. leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that defendant conduct furthers the
124. scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the behalf of the enterprise. Pursuant
125. to 18 U.S.C. § 1962(c).

126. Count 10

127. **Defendant Broker II Phillip Dennis.** Willful malice perpetuates kidnapping(restrictive movement) dealing with refuse products.
128. Plaintiff was forced to wait 4 days until for a disposition of refused product from **Defendant Broker II Phillip Dennis** . Defendant's
129. Conduct actually, potentially, obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness, how to
130. service debt, vehicle maintenance, home expenditure, leisure time at home, and anxiety. Which causes me to suffer a
131. compensable injury. And that defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail,
132. and or commerce. On the behalf of the enterprise. Pursuant to 18 U.S.C. § 1962(c).

133. **Amongst and between** things calls were placed to xxx 238 7374 a phone number that's on the bill of lading. Which it states,
134. report

135. discrepancies/refused along with HOS. calls where placed:

136. 03/27/2023 431p.m. est

137. 03/28/2023 711a.m. est

138. 03/28/2023 849a.m. est held for 1.27hrs no answer.

139. Thereafter, a call was placed to the actual shipper direct line. 03/28/2023 1210p.m. est xxx 355 8790

140. The call was about shippers loading procedures.

141. Shipper stated: Pallets are scanned before they are placed on the trailer. And that the packing list is created automatically from the
142. scans.

143. **Side Note:** Such information rebuffs John Doe 1 claim. That pallet comes from the plaintiff trailer. Review number styled 76.

144. Complaint 3

145. **Complaint:** Thereafter, amongst and between, Mar 27, 2023, 5:01 PM

146. A generic prefab email request came from a subordinate of **Defendant Broker II Phillip Dennis**. Most requests were already
147. fulfilled. Except copies of bol. Which were forwarded thereafter. We had another issue dealing with who's responsible for
148. payment. Prior such Legal authority was placed in his email **Defendant Broker II Phillip Dennis**. Fast forward to now. Loading or

149. unloading vehicle. Shipper/receiver shall be responsible for providing such assistance or shall compensate the owner or operator
150. for all costs associated with securing and compensating the others.

151. Count 11

152. **Defendant Broker II Phillip Dennis.** *Willful* malice sent his constituents to send repeated
153. email prescripts, requesting load count, and without compensation. Perpetuates extortion dealing with refuse products.
154. Defendant's conduct actually or potentially and or obstruct, and or delay, and or affect interstate commerce. Such *extortion*,
155. causes indebtedness, how to service debt, vehicle maintenance, home expenditure
156. leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that defendant conduct furthers the
157. scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the behalf of the enterprise. Pursuant
158. to **18 U.S.C. § 1962(c)**.

159. **Complaint:** On or about. Thu, Mar 30, 4:05 PM
160. Another email came from a different subordinate of **Defendant Broker II Phillip Dennis** . Same generic prefab email request.
161. Again dealing with loading/unloading freight emphasis on counting freight. We had another issue dealing with who's responsible
162. for payment. Such legal authority was placed in his email. Fast forward to now. Loading or unloading vehicle. Shipper/receiver
163. shall be responsible for providing such assistance or shall compensate the owner or operator for all costs associated with
164. securing and compensating the others.

165. Count 12

166. **Defendant Broker II Phillip Dennis.** *Willful malice* sent his constituents to send repeated email prescripts, requesting load count,
167. and without compensation, perpetuates *extortion* dealing with refuse products. Defendant's conduct
168. actually, potentially, obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness, how to service debt,
169. vehicle maintenance, home expenditure, leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And
170. that defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the
171. behalf of the enterprise. Pursuant to **18 U.S.C. § 1962(c)**.

172. **Plaintiff:** On or about. On or about Mar 28, 2023, 7:14 AM.
173. Plaintiff stated "Read the emails or stay off the email thread".

174. **Complaint:** On or about. On or about Mar 28, 2023, 7:23 AM.

175. Another email came from a different subordinate of **Defendant Broker II Phillip Dennis**. "The team still hasn't got the exact case
 176. count on the pallet and UPC code."
 177. Again dealing with loading/unloading freight. Emphasis on counting freight. Loading or unloading vehicle. Shipper/receiver shall
 178. be responsible for providing such assistance or shall compensate the owner or operator for all costs associated with securing
 179. and compensating others.

180. **Count 13**

181. **Defendant Broker II Phillip Dennis**. *Willful malice* sent his constituents to send repeated email prescripts, requesting load count,
 182. and without compensation. Such malice perpetuates *extortion* dealing with refuse products. Defendant's conduct
 183. actually, potentially, obstructs, delays, and affects interstate commerce, Such extortion causes indebtedness, how to service debt,
 184. vehicle maintenance, home expenditure, leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And
 185. that defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the
 186. behalf of the enterprise. Pursuant to **18 U.S.C. § 1962(c)**.

187. **Complaint:** On or about. On or about. Mar 28, 2023, 8:47 AM.
 188. "Hire a lumber for a case count. In addition, review the email for UPC CODE.
 189. I've noticed it's a bunch of negligence reviewing the info I've sent
 190. Weather you can't read
 191. Didn't review the info
 192. Reviewed the info and just being dismissive"

193. **Count 14**

194. Again Shipper/receiver shall be responsible for providing such assistance or shall compensate the owner or operator for all costs
 195. associated with securing and compensating the others. **Defendant Broker II Phillip Dennis** *willful malice* sent his constituents to
 196. send repeated email prescripts, requesting load count, and without compensation. Such perpetuates extortion dealing with refuse
 197. products. Defendant's conduct actually, potentially, obstructs, delays, and affects interstate commerce. Such extortion causes
 198. indebtedness, how to service debt, vehicle maintenance, home expenditure
 199. leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that defendant conduct furthers the
 200. scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the behalf of the enterprise. Pursuant
 201. to **18 U.S.C. § 1962(c)**.
 202. On or about. On or about. Mar 28, 8:55 AM.

203. **Subordinate of Defendant Broker II Phillip Dennis** . "We'll have the team review the documents that were sent."

204. **Plaintiff:** On or about. Mar 28, 8:57 AM

205. looking for an update on lumber.

206. **Subordinate:** On or about. Mar 28, 2023, 9:02 AM.

207. "We can't guarantee a lumber for the case count. No worries, that team will figure it out"

208. **Complaint:** On or about. Mar 28, 9:07 AM

209. "Call capstone.... They have a 1800 number. I'm sure it's several lumber services in the area.... In addition, stop frauding ya'll

210. deal with Capstone all the time....for lumber services.... It's apparent there's no willingness not to call capstone....."

211. Shipper/receiver shall be responsible for providing such assistance or shall compensate the owner or operator for all costs

212. associated with securing and compensating the others

213. Count 15

214. **Defendant Broker II Phillip Dennis:** *willful malice* perpetuates kidnapping(restrictive movement) dealing with refuse products.

215. Unwillingness, to call Capstone to service the refused product. Defendant's conduct actually or potentially and or obstruct, and or

216. delay, and or affect interstate commerce. Such restrictive movement, causes indebtedness, how to service debt, vehicle

217. maintenance, home expenditure leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that

218. defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the

219. behalf of the enterprise. Pursuant to 18 U.S.C. § 1962(c).

220. Count 16

221. **Defendant Broker II Phillip Dennis** *willful malice* sent his constituents to send repeated email prescripts, requesting load count,

222. and without compensation. Such perpetuates extortion dealing with refuse products. Defendant's conduct actually, potentially,

223. obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness, and anxiety. Cause to suffer a

224. compensable injury. And that defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail,

225. and or commerce. On the behalf of the enterprise. Pursuant to 18 U.S.C. § 1962(c).

226. **Subordinate:** On or about Mar 28,9:19 AM

227. "I have flagged the image of the UPC that you previously submitted, I apologize that we missed that one. However, we will need
228. your driver to provide a count of cases in order for the customer to provide a disposition on how to handle the rejected freight from
229. this shipment."

230. **Plaintiff:** On or about. Mar 28, 2023, 9:22 AM

231. Sent a warning to **Defendant Broker II Phillip Dennis** to service his load. There are too many other parties replying.

232. **Subordinate:** On or about. Mar 28, 2023, 9:30 AM

233. "Phillip, Can you assist here?"

234. **Plaintiff:** On or about. Mar 28, 2023, 9:34 AM

235. Reaffirming I'm not counting nothing. Recap of the degrees of tort. (We passed the degree of negligence and willful. We at the degree willful malice)

236. **Plaintiff:** Few more emails were sent on my behalf.

237. -Of whom the product owners.

238. -Product on pallet shifted due to being stacked*.

239. -Shipper only shipped 26 pallets. Therefore, there's no reason why shippers need to stack.

240. -Consignee missing a pallet. But there's no notation on manifest of which pallet.

241. Side note: Such pallet have no shipping labels. Therefore, no-one can match it against a manifest. Thereso, consignee can place

242. a refused pallet onto others to bear incurred expenses. Like referenced in the numbers styled 51-86.

243. **Plaintiff:** Side Note. **Defendant Broker II Phillip Dennis** is emailing for a different thread. However, I moved the response back to the

244. original thread.

245. On or about Mar 28, 2023, 10:48 AM

246. A reply was sent stating there's a charge for the plaintiff to count cases or hiring a lumber.

247. **Plaintiff:** On or about. Mar 28, 2023, 11:04 AM follow up email

248. "Servitude is illegal under the constitution. You must pay ppl to perform services. It will definitely keep you out of harm's way of

249. R.I.C.O. (Extortion/coercion). Even in your passive form of keep asking (Extortion/coercion)...It's Not And honestly I can't say with

250. certainty who put that pallet on there..I wasn't watching load or unload...You're going to owe me another \$1550. Most importantly

251. you wasn't available until 945am"

252. **Defendant Broker II Phillip Dennis:** On or about. Mar 28, 2023, 11:17 AM.

253. Sir all we are asking for is a case count from you...this is to get things completed so you can go about your week and other freight.

254. Without that we are not able to help resolve this issue. If you dump product somewhere or dispose it is only going to lead to

255. issues.

256. **Plaintiff:** On or about. Mar 28, 2023, 12:03 PM

257. "1st and foremost I'm not going back there and counting nothing withOut compensation.

258. 2nd You misconstrued who has the legal rite to do what. Again You need to go read FMCSA/USCODE. THE FMCSA IS THE SHORT

259. VERSION....

260. THE US CODE IS THE LONG VERSION.... THE USCODE WILL HAVE EVERY CONDUCT SPILLED OUT.... THEN PPL WONDER

261. WHY ITS TOO MUCH REGULATION Simple the....regulations have to account for ErrOnes conduct... 1st thing comes out of

262. everyone one mouth.... I didn't know you can or can't do dat...I didn't know that was a law..... etc.....So Sincere Please don't get a

263. contract confused with criminal law

264. And that you shouldn't make nor enforce any contract that conflicts with criminal law rule's regulations etc....

265. It seems you have a bad habit of forcing ppl to do stuff...Even if one told you it's criminal....

266. I noticed from a distance this is what you do.....Nah.... we going to get those ppl compensation for anyOne that had to count freight

267. Working for free is illegal.....When that time comes, we are going to ask the judge to take it exclusively out of you paycheck..

268. You can work for free.... for the rest of your life...Please don't complainGo start you own business and start that crap....

269. Litigation costs money...Please remember your conduct When these CEOs uses more and more automation...

270. Humanes are too much of a liabilityDefinitely in the unnecessary liability department... For as I'm concerned you are not doing

271. anything until I count.... Smells like extortion/coercion and kidnapping to me..... Kidnapping only mean restricted

272. movement...(paraphrase)

273. This is a restricted movement to me....."

274. **Defendant Broker II Phillip Dennis:** On or about.Mar 28, 2023, 12:26 PM.

275. Sir and where is the truck currently/product can we get a zip code to look for assistance

276.

277. **Plaintiff:** On or about. Mar 28, 2023, 1:12 PM

278. Location was provided.

279.

280. **Plaintiff:** On or about. Mar 28, 5:55 PM I need my updated rate com. Also your conduct infers with my ability to pay for maintenance
281. and service debt in a timely manner....In addition, you could've called tow service for a count....If you refuse to pay me.....

282. **Subordinate:** On or about. Tue, Mar 28, 8:28 PM

283. "Please be advised that as per our scheduling team this load is still on pending return approval and as soon as we receive
284. confirmation from them we will let you know right away."

285. **Plaintiff:** On or about. Mar 30, 2023, 4:05 PM

286. To: Brkr. P. Dennis. I haven't received any updates.

287. **Subordinate:** On or about Mar 30, 2023, 4:14 PM

288. "We are still waiting for the update, we'll keep you posted. Thanks!"

289. **Plaintiff:** On or about. Mar 31, 2023, 1:20 AM

290. Please stay off this stat

291. "If you not:

292. P. Dennis

293. Upper management

294. Owners

295. You risking your name being in a civil R.I.C.O complaint Please don't make others ppl problems become your own..."

296. **Plaintiff:** On or about. Fri, Mar 31, 7:21 AM

297. "Please stay off this stat

298. If you not:

299. P. Dennis

300. Upper management

301. Owners

302. You are about to be invoiced

303. \$1830 a day Retroactive. Starting From Monday. Charges back the shipper/Consignee

304. Storage fees: \$100 a day.

305. Fuel daily Cost: \$50
306. Truck Operating Cost at Idle \$50
307. Charges back the shipper/Consignee"
308. **Subordinate:** On or about. Fri, Mar 31, 9:42 AM
309. Miscellaneous email was sent.
310. **Plaintiff:** On or about. Mar 31, 2023, 1:17 PM
311. We are not doing dat. Making other threads. Please
312. keep this on tha same Thread...
313. "Due to this being a partial rejection we can offer \$100 stop off fee + \$2.00 per miles OOR.
314. How many out of route miles were there?"
315. I don't know what you mean about
316. "OOR"?
317. I don't know where this freight is going?
318. I have some strong language about to come next...
319. **Plaintiff:** On or about. Mar 31, 2023, 1:49 PM
320. Paraphrase:
321. \$1550 return freight back to the shipper.
322. Itemize charges:
323. Fuel daily Cost: \$50
324. Truck Operating Cost at idle \$50
325. Charges back the shipper/Consignee.
- 326.
327. **Complaint:** On or about Apr 4, 2023, 8:48 AM. Plaintiff emailed **Defendant Broker II Phillip Dennis**
328. Asking for clarification about compliance issues. It's an immediate concern. Inability to book work.

329. Screenshot was taken and sent. No-reply as of yet 249pm est.
330. Side note: These are the exact acts OSHA forbids. Retallatory conduct! We are not saying the defendant can't do compliance review.
331. Defendants need to pick a better time. If not, face a continuum of OHSA complaints. Plaintiff will give you several. Dealing with these
332. matters herein.

333. **Count 17**

334. **Defendant Broker II Phillip Dennis: Willful malice** is hindering the discovery of who initiated a compliance review. Which prevents
335. plaintiff inability to book work. **Defendant** failed his fiduciary responsibility. While promoting a hostile and or intimating workplace.
336. Which is a direct OSHA violation. Defendant's conduct actually, potentially, obstructs, delays, and affects interstate commerce.
337. Such extortion causes indebtedness, how to service debt, vehicle maintenance, home expenditure
338. leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And that defendant conduct furthers the
339. scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the behalf of the enterprise. Pursuant
340. to 18 U.S.C. § 1962(c).

341. **Complaint:** On or about Apr 4, 2023, 9:14 AM
342. Plaintiff ask **Defendant Broker II Phillip Dennis** I'll need the head of compliance department contact info
343. And the rep that deals with Highway App inc. No reply!

344. **Count 18**

345. **Defendant Broker II Phillip Dennis: Willful malice** is hindering the discovery of compliance department contact info and Highway
346. App inc. contact info. **Defendant** failed his fiduciary responsibility. While promoting a hostile and or Intimading workplace. Which is
347. a direct OSHA violation. Defendant's conduct
348. actually, potentially, obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness, how to service debt,
349. vehicle maintenance, home expenditure leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And
350. that defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the
351. behalf of the enterprise. Pursuant to 18 U.S.C. § 1962(c).

352. **Count 19**

353. **Defendant Broker II Phillip Dennis willful malice** sent his constituents to send repeated email prescripts, requesting load count,
354. and without compensation. Again Shipper/receiver shall be responsible for providing such assistance or
355. shall compensate the owner or operator for all costs associated with securing and compensating the others.
356. Such perpetuates extortion dealing with refuse products. Defendant's conduct

357. actually, potentially, obstructs, delays, and affects interstate commerce. Such extortion causes indebtedness, how to service debt,
vehicle maintenance, home expenditure leisure time at home, and anxiety. Which causes me to suffer a compensable injury. And
358. that defendant conduct furthers the scheme of racketeering activity. While using the interstate wire, mail, and or commerce. On the
359. behalf of the enterprise. Pursuant to 18 U.S.C. § 1962(c).

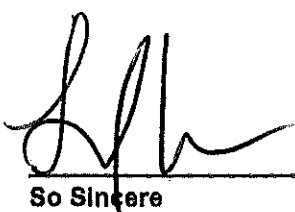
360. Closing

361. Defendant(s) directly and indirectly conducted and participated in the conduct of the enterprise's affairs through the pattern of
362. racketeering and activity described above, in violation of 18 U.S.C. § 1962(c). As a direct and proximate result of the Defendants
363. racketeering activities and violations of 18 U.S.C. § 1962(c), Plaintiffs continue to suffer a compensable injury.
364. WHEREFORE, Plaintiff requests that this Court enter judgment against the Count I Defendant(s) as follows:

365. Relief: Tentative

366. Starting From 03/27/2023 Monday. Charges back the shipper/Consignee
367. Tariff 1830x10= \$18300
368. Truck Operating Cost at idle: 50x10 \$500
369. Fuel daily Cost: 50x10 \$500
370. Storage fees:100x10 \$1000
371. R.I.C.O statutory Fees: \$250000
372. Tentative amount: \$270300
373. Prayers for relief, including actual damages, treble damages and attorney's fees.

Plaintiff
LATIF CONWAY
P.O. BOX 14242
CINCINNATI, OH 45250
Pro se

 4/6/23
So Sincere Date

DEFENDANT

LILY SHEN CEO

Transflix Inc.

11 Park Place, FI 19

New York, NY 10007-2804

Defendant

Transflix Inc. 11 Park Place, FI 19

New York, NY 10007-2804

Defendant

Broker II Phillip Dennis

Transflix Inc. 11 Park Place, FI 19

New York, NY 10007-2804

Defendant

Ed Byrd FOUNDER & PRESIDENT

Kontane Logistics

830 DROP OFF DR

SUMMERVILLE, SC 29483.

Defendant

Jason Ball DIRECTOR OF LOGISTICS

Kontane Logistics

830 DROP OFF DR

SUMMERVILLE, SC 29483.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 4/6 2023

Signature of Plaintiff

Printed Name of Plaintiff

Latif Conway
Latif Conway

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____